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17 UNITED STATES DISTRICT COURT

18 DISTRICT OF NEVADA

19 KONECRANES GLOBAL CORPORATION,

20 Plaintiff,

21 v.

22 MODE TECH (BEIJING) CO., LTD.,
23

24 Defendant.

Case No. 2:18-cv-02015-GMN-NJK

**STIPULATION AND ORDER FOR
MODIFICATION OF BRIEFING
SCHEDULE AND CLAIM
CONSTRUCTION HEARING MATTERS
(ECF NO. 98).**

(Second Request)

1 Pursuant to LR IA 6-1 and LPR 1-3, Plaintiff Konecranes Global Corporation
2 (“Konecranes”) and Defendant Mode Tech (Beijing) Co., Ltd. (“Mode Tech” and together, the
3 “Parties”) agree and respectfully request a six-week extension of Claim Construction briefing
4 deadlines and a corresponding continuance of the Patent Tutorial and Claim Construction
5 hearings (currently unscheduled) (ECF No. 98), due to the continued travel-related concerns of
6 counsel for the Parties. Specifically, in light of current travel recommendations issued by the
7 President of the United States¹ and Centers for Disease Control and Prevention related to the
8 coronavirus (COVID-19) as recognized in the Court’s Temporary General Order 2020-03.
9 Specifically, the Parties’ respective counsel have discussed and agreed to an approximate six-
10 week extension of the Briefing Deadlines to allow the deposition of Konecranes’ expert Emil
11 Geiger to be re-scheduled from April 8, 2020 to May 20, 2020 for the same travel-related
12 concerns.² The Parties have correspondingly stipulated and agreed to extend Mode Tech’s
13 deadline to file its Claim Construction Responsive Brief from April 22, 2020 to June 3, 2020
14 and Konecranes’ deadline to file its Claim Construction Reply Brief from April 29, 2020 to June
15 10, 2020 (ECF No. 98). Accordingly, the Parties respectfully request that the Court grant this
16 Stipulation and continue the Patent Tutorial and Claim Construction hearings for approximately
17 six weeks to a date convenient to the Court.

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26 ¹ [https://www.whitehouse.gov/wp-content/uploads/2020/03/03.16.20_coronavirus-](https://www.whitehouse.gov/wp-content/uploads/2020/03/03.16.20_coronavirus-guidance_8.5x11_315PM.pdf)
27 [guidance_8.5x11_315PM.pdf](https://www.whitehouse.gov/wp-content/uploads/2020/03/03.16.20_coronavirus-guidance_8.5x11_315PM.pdf) (recommending a 30-day delay in discretionary travel).

28 ² Mr. Geiger’s deposition is scheduled to take place in Reno, Nevada.

1 DATED: April 3, 2020.

2 **MCDONALD CARANO LLP**

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4 s/ Kristin T. Gallagher

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20 **IT IS SO ORDERED.**

21 **IT IS FURTHER ORDERED** that the parties shall jointly file a
22 Notice with the Court upon completion of briefing on June 10,
23 2020, identifying three proposed dates for the Patent Tutorial and
24 Claim Construction hearings. The Court will then coordinate with
the parties to set a final date for hearings.

25 Dated this 3 day of April, 2020.

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28 Gloria M. Navarro, District Judge
UNITED STATES DISTRICT COURT